



Various locations
Natalia Vasquez

People Powered. Asset Strong.

October 18, 2019
USEPA – Region III, Air Protection Division
Office of Air Enforcement & Compliance Assistance - NSPS
1650 Arch Street (3AP000)
Philadelphia, PA 19103-2029

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OCT 24 2019

Air & Radiation Division

**RE: Annual Compliance Report – Compliance Period: August 2, 2018 – August 1, 2019
New Source Performance Standard Subpart OOOOa
Arsenal Midstream LLC**

To Whom It May Concern:

Arsenal Midstream LLC (Arsenal) submits this letter and attachments to meet the annual reporting requirements for New Source Performance Standard (NSPS) Subpart OOOOa (40 CFR §60.5420a) for affected facilities constructed, reconstructed, or modified after September 18, 2015.

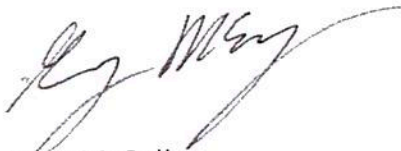
The attachments contain required information for the affected facilities operated by Arsenal during the initial compliance period for NSPS Subpart OOOOa (August 2, 2018 through August 1, 2019). In accordance with the rule, this report is being submitted no later than 90 days after the end of the initial compliance period (October 31st). The reporting requirements are summarized as follows:

- §60.5420a(b)(1): The general information specified in paragraphs (b)(1)(i) through (iv) of this section.
Included in Attached Excel file.
- §60.5420a(b)(2): For each gas well affected facility, the information in paragraphs (b)(2)(i) through (iii) of this section.
Arsenal Midstream does not operate gas well affected facilities.
- §60.5420a(b)(3): For each centrifugal compressor affected facility, the information specified in paragraphs (b)(3)(i) through (iv) of this section.
Arsenal Midstream does not operate centrifugal compressor affected facilities as identified in §60.5365a(b).
- §60.5420a(b)(4): For each reciprocating compressor affected facility, the information specified in paragraphs (b)(4)(i) and (ii) of this section.
Included in attached Excel file.

- §60.5420a(b)(5): For each pneumatic controller affected facility, the information specified in paragraphs (b)(5)(i) through (iii) of this section.
Arsenal Midstream does not operate pneumatic controller affected facilities as identified in §60.5365(d). It should be known that Arsenal does operate pneumatic controllers installed after September 18, 2015, but these devices are intermittent and/or low-bleed devices. As such, they are not considered pneumatic controller affected facilities as defined under NSPS Subpart 0000a.
- §60.5420a(b)(6): For each storage vessel affected facility, the information in paragraphs (b)(6)(i) through (vii) of this section.
Arsenal Midstream does not operate any storage vessel affected facilities as identified in §60.5365a(e). It should be known that Arsenal does operate storage vessels with the potential for VOC emissions that were installed after September 15, 2015. However, the VOC emissions from these storage vessels are less than 6.0 tons per year which accounting for enforceable limitations, they are not storage vessel affected facilities as defined under NSPS Subpart 0000a.
- §60.5420a(b)(7): For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (xii) of this section.
Included in attached Excel file.
- §60.5420a(b)(8): For each pneumatic pump affected facility, the information specified in paragraphs (b)(8)(i) through (iii).
Arsenal Midstream does not operate pneumatic pump affected facilities as identified in §60.5365a(h).

Please feel free to contact me at 724-940-1185, if there are questions regarding the information in this Initial Annual Report.

Sincerely,
Arsenal Midstream LLC



Greg McCully,
Director of Health, Safety & Environment

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Coi
For each affected facility, an owner or operator must include the information specified in parag
The asterisk (*) next to each field indicates that the corresponding field is required.

| | | |
|---|---|---|
| Facility Record No. * (Field value will automatically generate if a value is not entered.) | Company Name * (\$60.5420a(b)(1)(i)) | Facility Site Name * (\$60.5420a(b)(1)(i)) |
|---|---|---|

| | |
|-------------------|------------------------------|
| e.g.: ABC Company | e.g.: XYZ Compressor Station |
|-------------------|------------------------------|

- | | |
|---------------------------|---------------------------|
| 1 Arsenal Midstream, LLC | Cather Compressor Station |
| 2 Arsenal Midstream, LLC | Cather Compressor Station |
| 3 Arsenal Midstream, LLC | Goff Compressor Station |
| 4 Arsenal Midstream, LLC | Goff Compressor Station |
| 3 Arsenal Midstream, LLC | Goff Compressor Station |
| 4 Arsenal Midstream, LLC | Goff Compressor Station |
| 5 Arsenal Midstream, LLC | Goff Compressor Station |
| 6 Arsenal Midstream, LLC | Comet Compressor Station |
| 7 Arsenal Midstream, LLC | Comet Compressor Station |
| 8 Arsenal Midstream, LLC | Comet Compressor Station |
| 9 Arsenal Midstream, LLC | Comet Compressor Station |
| 10 Arsenal Midstream, LLC | Comet Compressor Station |

struction, Modification or Reconstruction Commenced After September 18, 2015 -
raphs (b)(1)(i) through (iv) of this section in all annual reports:

| US Well ID or US Well ID Associated with the Affected Facility, if applicable. * (\$60.5420a(b)(1)(i)) | Address of Affected Facility * (\$60.5420a(b)(1)(i)) | Address 2 | City * | County * |
|---|---|-----------------|----------------|--------------------|
| e.g.: 12-345-67890-12 | e.g.: 123 Main Street | e.g.: Suite 100 | e.g.: Brooklyn | e.g.: Kings County |
| 2439 Wendal Road | 2439 Wendal Road | | Flemington | Taylor |
| 50 E. Davisson Run Road | 50 E. Davisson Run Road | | Flemington | Taylor |
| 50 E. Davisson Run Road | 50 E. Davisson Run Road | | Clarksburg | Harrison |
| 50 E. Davisson Run Road | 50 E. Davisson Run Road | | Clarksburg | Harrison |
| 50 E. Davisson Run Road | 50 E. Davisson Run Road | | Clarksburg | Harrison |
| 50 E. Davisson Run Road | 50 E. Davisson Run Road | | Clarksburg | Harrison |
| Route 50E, Wendel Road | Route 50E, Wendel Road | | Wendel | Taylor |
| Route 50E, Wendel Road | Route 50E, Wendel Road | | Wendel | Taylor |
| Route 50E, Wendel Road | Route 50E, Wendel Road | | Wendel | Taylor |
| Route 50E, Wendel Road | Route 50E, Wendel Road | | Wendel | Taylor |
| Route 50E, Wendel Road | Route 50E, Wendel Road | | Wendel | Taylor |

[illegible]

| | | | | |
|--|---|--|--|---------------------------------------|
| Beginning Date of Reporting Period. * (\$60.5420a(b)(1)(iii)) | Ending Date of Reporting Period. * (\$60.5420a(b)(1)(iii)) | <p>Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process. *</p> <p>(\$60.5420a(b)(12))</p> <p>Please provide only one file per record.</p> | Please enter any additional information. | Enter associated file name reference. |
|--|---|--|--|---------------------------------------|

e.g.: 01/01/2016 e.g.: 06/30/2016 e.g.: Certification.pdf or XYZCompressorStation.pdf

e.g.: addInfo.zip or XYZCompressorStation.pdf

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Hours NA

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Cc
For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor
The asterisk (*) next to each field indicates that the corresponding field is required.

| Facility Record No. * (Select from dropdown list - may need to scroll up) | Identification of Each Affected Facility * (§60.5420a(b)(1)) | Date of Survey * (§60.5420a(b)(7)(i)) |
|---|--|--|
|---|--|--|

e.g.: Well Site ABC

e.g.: 8/13/17

- | | |
|-----------------------------|------------|
| 8 Comet Compressor Station | 8/21/2018 |
| 8 Comet Compressor Station | 12/12/2018 |
| 8 Comet Compressor Station | 12/12/2018 |
| 8 Comet Compressor Station | 2/21/2019 |
| 8 Comet Compressor Station | 4/30/2019 |
| 8 Comet Compressor Station | 8/21/2018 |
| 1 Cather Compressor Station | 12/13/2018 |
| 1 Cather Compressor Station | 2/21/2019 |
| 1 Cather Compressor Station | 4/30/2019 |
| 1 Cather Compressor Station | 8/21/2018 |
| 3 Goff Compressor Station | 12/13/2018 |
| 3 Goff Compressor Station | 2/21/2019 |
| 3 Goff Compressor Station | 4/30/2019 |

Commenced After September 18, 2015 - 60.5420a(b) Annual Report
r station within the company-defined area, an owner or operator must include the records of

| Survey Begin Time * (\$60.5420a(b)(7)(ii)) | Survey End Time * (\$60.5420a(b)(7)(iii)) | Name of Surveyor * (\$60.5420a(b)(7)(iii)) | Ambient Temperature During Survey * (\$60.5420a(b)(7)(iv)) | Sky Conditions During Survey * (\$60.5420a(b)(7)(iv)) | Maximum Wind Speed During Survey * (\$60.5420a(b)(7)(iv)) | Monito ring Instrum ent Used * (\$60.5420a(b)(7)(v)) |
|---|--|---|--|---|--|---|
|---|--|---|--|---|--|---|

| | | | | | | |
|----------------|---------------|------------------|------------|------------------------|-------------|---|
| e.g.: 10:00 am | e.g.: 1:00 pm | e.g.: John Smith | e.g.: 90°F | e.g.: Sunny, no clouds | e.g.: 2 mph | e.g.: Compa ny ABC optical gas imaging camera |
|----------------|---------------|------------------|------------|------------------------|-------------|---|

| | | | | | | |
|----------|----------|-------------|----|--------|---|----------|
| 7:50 AM | 8:28 AM | Steve LaRue | 71 | cloudy | 2 | FLIR GFE |
| 11:42 AM | 12:35 AM | Steve LaRue | 33 | cloudy | 1 | FLIR GFE |
| 11:42 AM | 12:35 AM | Steve LaRue | 33 | cloudy | 1 | FLIR GFE |
| 8:45 AM | 9:12 AM | Steve LaRue | 41 | cloudy | 2 | FLIR GFE |
| 12:00 PM | 12:56 PM | Steve LaRue | 81 | cloudy | 0 | FLIR GFE |
| 9:35 AM | 10:15 AM | Steve LaRue | 78 | cloudy | 5 | FLIR GFE |
| 2:55 PM | 3:27 PM | Steve LaRue | 41 | cloudy | 2 | FLIR GFE |
| 10:35 AM | 11:02 AM | Steve LaRue | 43 | cloudy | 4 | FLIR GFE |
| 2:30 PM | 3:05 PM | Steve LaRue | 82 | cloudy | 0 | FLIR GFE |
| 9:01 AM | 9:32 AM | Steve LaRue | 76 | cloudy | 5 | FLIR GFE |
| 2:05 PM | 2:47 PM | Steve LaRue | 41 | cloudy | 3 | FLIR GFE |
| 9:45 AM | 10:30 AM | Steve LaRue | 43 | cloudy | 4 | FLIR GFE |
| 3:10 PM | 15:42 | Steve LaRue | 84 | cloudy | 0 | FLIR GFE |

| | | | | | |
|--|---|--|--|---|---|
| Deviations From Monitoring Plan (If none, state none.) * (\$60.5420a(b)(7)(vi)) | Type of Component for which Fugitive Emissions Detected * (\$60.5420a(b)(7)(viii)) | Number of Each Component Type for which Fugitive Emissions Detected * (\$60.5420a(b)(7)(vii)) | Type of Component Not Repaired as Required in §60.5397a(h) * (\$60.5420a(b)(7)(viii)) | Number of Each Component Type Not Repaired as Required in § 60.5397a(h) * (\$60.5420a(b)(7)(viii)) | Type of Difficult-to-Monitor Components Monitored * (\$60.5420a(b)(7)(ix)) |
|--|---|--|--|---|---|

e.g.: None

e.g.: Valve

e.g.: 3

e.g.: Valve

e.g.: 1

e.g.: Valve

| | | | | |
|------|------------|------|----|----|
| None | Connection | 1 NA | NA | NA |
| None | Connection | 5 NA | NA | NA |
| None | Valve | 1 NA | NA | NA |
| None | Valve | 1 NA | NA | NA |
| None | Valve | 1 NA | NA | NA |
| None | Connection | 1 NA | NA | NA |
| None | None | 0 NA | NA | NA |
| None | None | 0 NA | NA | NA |
| None | None | 0 NA | NA | NA |
| None | Connection | 1 NA | NA | NA |
| None | None | 0 NA | NA | NA |
| None | None | 0 NA | NA | NA |
| None | None | 0 NA | NA | NA |
| None | Connection | 1 NA | NA | NA |

| Number of Each Difficult-to-Monitor Component Type Monitored * (§60.5420a(b)(7)(ix)) | Type of Unsafe-to-Monitor Component Monitored * (§60.5420a(b)(7)(ix)) | Number of Each Unsafe-to-Monitor Component Type Monitored * (§60.5420a(b)(7)(ix)) | Date of Successful Repair of Fugitive Emissions Component * (§60.5420a(b)(7)(x)) | Type of Component Placed on Delay of Repair * (§60.5420a(b)(7)(xi)) |
|--|---|---|--|---|
|--|---|---|--|---|

e.g.: 1

e.g.: Valve

e.g.: 1

e.g.: 11/10/16

e.g.: Valve

| | | | | |
|----|----|----|-----------|------------|
| NA | NA | NA | 8/21/2018 | NA |
| NA | NA | NA | 1/24/2019 | Connection |
| NA | NA | NA | 1/24/2019 | Valve |
| NA | NA | NA | 2/27/2019 | NA |
| NA | NA | NA | 5/3/2019 | NA |
| NA | NA | NA | 8/21/2018 | NA |
| NA | NA | NA | NA | NA |
| NA | NA | NA | NA | NA |
| NA | NA | NA | NA | NA |
| NA | NA | NA | 8/21/2018 | NA |
| NA | NA | NA | NA | NA |
| NA | NA | NA | NA | NA |
| NA | NA | NA | 8/21/2019 | NA |
| NA | NA | NA | NA | NA |
| NA | NA | NA | 5/1/2019 | NA |

